

**From:** [Allen, Bob \(PCS\)](#)  
**To:** [Garyg.Miller/R6/USEPA/US@EPA](#)  
**Cc:** [Patel, Snehal \(CAO\)](#); [Babin, Latrice \(PCS\)](#); [Vancas, Cecilia \(PCS\)](#); [Mueller, Stuart \(PCS\)](#)  
**Subject:** FW: Draft Fate & Transport Study- Comments from Pollution Control 3/28/12  
**Date:** 03/28/2012 05:04 PM

---

Gary,

Please see our below comments. Latrice Babin is our POC for these comments.

Bob Allen

❖ Section 1.3 Study Objectives

- This section states *the main goal of the work discussed in this report is to simulate physical and chemical processes that are controlling chemical fate and transport of key Site-related contaminants within the aquatic environment of the Site.*
- In the detail of the work it is anticipated that resources have been exhausted to determine events/ activities that may impact or alter the state of the sediment in and around the site. In reading the document, it could not be determined whether major rain events such as the June 2001 Tropical Storm Allison nor the 2008 Hurricane Ike was included as factors. The October 1994 rain storm that resulted in the Pipeline explosion was documented as a notable storm event. It is requested that data regarding such events are added to determine the river depth and possible impacts.

❖ Section 2.3 Overview of Technical Approach

- It appears that consideration was given to the nearby outfalls that may impact the flow of the river. However, it is not apparent that influence of current movement from barge traffic was considered.

❖ Section 3.3.2 (page 31) discusses the flow rate of the San Jacinto River on October 19, 1994 (during the river fire and explosion event), as it related to the 100 year flood plain. Please compare this flow rate to the flow rate seen as a result of Tropical Storm Allison (2001) and Hurricane Ike (2008) since these two events devastated the vast majority of Harris County water ways.

❖ Section 4.2.1 Sediment Properties

- The movement of constant barge traffic near the waste pits brings concern of sediment movement. While conducting SJR surface water sampling, PCS has observed increased silting as a direct result of barge movement. Some areas are so highly silted that boats are no longer able to launch in areas previously used for such activity.

Please review and let me know if you have any questions.

Thank you,  
Latrice

*Latrice Babin, Ph.D.*

Environmental Toxins & Special Project Manager  
Harris County Pollution Control Services Department

**101 S. Richey, Suite H**  
**Pasadena, Texas 77506**

**(713) 274-6413**

**(713) 274-6475**

email [latrice.babin@pcs.hctx.net](mailto:latrice.babin@pcs.hctx.net)